



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

MAR 21 1991 DENVER, COLORADO 80202-2405

MAR 28 1991

Ref: 8HWM-FF

Mr. Frazer Lockhart  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: OU 5 - Old Landfill

Dear Mr. Lockhart:

Members of my staff and CDH met with plant representatives on March 5, 1991 for an update on the status of issues pertaining to OU 5 (Woman Creek). Issues were identified during a January 10, 1991 meeting and again in EPA's follow-up letter of January 17, 1991. From discussions at the most recent meeting, it is apparent that significant progress in addressing the issues has not been accomplished by DOE and EG&G. The following concerns remain.

Radiologic surveys completed in the last year indicated the presence of exposed radionuclide material on and very near surface at the old landfill. Because of the old landfills location, upgradient of the interceptor ditch and Woman Creek, and the local instability of the landfill, EPA recommended installation of additional air and surface water monitoring stations downgradient of the old landfill and placement of a soil stabilizer over areas with exposed or shallow radionuclides in the old landfill.

Your staff presented two new locations for air monitoring stations based on wind rose information for the plant area. The monitors must be placed to determine potential impacts from remedial activities, to obtain information for a baseline risk assessment and to assure plant worker safety. Additionally, DOE and EG&G indicated that only electric-powered air monitors could be used which would delay installation for a year due to funding problems. Field work is scheduled to begin in October, 1991, well before the proposed one year time frame for air monitor installation. DOE must take timely action to assure that adequate information is gathered for risk assessment analysis and to assure protection of workers. The OU 5 RI/RFI workplan should also include air monitoring activities which will address these issues.

Review of surface water data of stations downgradient from the old landfill and upgradient from the 881 Hillside indicate elevated radionuclides. The data are not definitive due to high

**ADMIN RECORD**

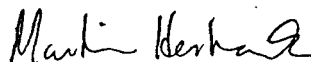
counting error values. In many cases (SW32, SW34, SW35, SW36), however, the measured value of filtered surface water exceeds the error term and is greater than the surface water standard for Woman Creek. The data indicate the old landfill is a potential source. Elevated concentrations of radionuclides are present also upgradient from the old landfill and downgradient from the ash pits indicating that the ash pits are a potential source. Two surface water stations downgradient of the old landfill have been added as a result of the January meeting. Your staff was not certain on the sampling status of these stations. Samples must be collected on the next sample round and results must be sent to EPA as soon as the sample results are available.

In an effort to prevent releases from the old landfill via the air or surface water pathway, it was recommended that the soil be stabilized in the areas of concern as soon as possible. To date, no significant progress has been made. Preventative measures, approved by EPA, must be taken to preclude continuing release from this site.

During the meeting, it came to EPA's attention that dumping of street cleaning wastes is occurring on an ongoing basis at the old landfill. Such dumping is inconsistent with the planned CERCLA response since it may exacerbate any ground water or soil contamination at the old landfill. Therefore, dumping at the old landfill should cease immediately.

EPA requests a written response to the above issues by March 29, 1991. If you or members of your staff have questions pertaining to these issues, please contact Patricia Corbetta at (303) 294-1135.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

cc: Patricia Corbetta, 8HWM-FF  
Sonya Pennock, EPA  
Gary Baughman, CDH  
Joe Schieffelin, CDH  
Tom Olsen, DOE  
Tom Greengard, EG&G  
Tom Ottensman, EG&G

FCD:March 14, 1991:PAC:OU5UPDT.LTR